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C_LH
CHEMICAL LAND HOLDINGS, INC.

October 17, 2000

U.S. Environmental Protection Agency, Region II
Emergency and Remedial Response Division
290 Broadway, 19th Floor, Room W-20
New York, NY 10007-1866

Attention: Ms. Sharon Jaffess
Remedial Project Manager

Subject: Data Validation Procedural Clarification
Passaic River Study Area
Administrative Order on Consent Index No. II-CERCLA-0117

Reference: E-mail from Mr. George Karras, dated October 5, 2000

Dear Ms. Jaffess:

I am writing in response to the e-mail sent to you by George Karras, which you forwarded to my attention on October 5, 2000 (attached). The e-mail written by Mr. Karras contains two items which require clarification.

First, Mr. Karras mistakenly refers to the "Diamond Alkali Data"; however, the data that Mr. Karras is reviewing are from the Passaic River Study Area, not the Diamond Alkali Site located on Lister Avenue. The data that Mr. Karras is reviewing were collected during implementation of the Ecological Sampling Plan (ESP) and they conform with the Work Plan and Quality Assurance Project Plan (QAPP) approved for the Passaic River Study Area by the U.S. Environmental Protection Agency (USEPA) on April 6, 1999.

Second, and more importantly, the USEPA Region 2 Data Validation Standard Operating Protocol (SOP) to which Mr. Karras refers (HW-25, September 1999) for evaluation of Dibenzodioxin and Dibenzofuran data analyzed by USEPA method 1613A is not approved for use on this project and should not be used for this project.

Prior to the issuance of HW-25 in September 1999, USEPA Region 2 did not have a validation SOP for method 1613A. Therefore, in 1995, Environmental Data Services, Ltd. (EDS) was contracted by Maxus Energy (now Chemical Land Holdings) to develop and submit for USEPA review/approval a validation SOP for method 1613A. This document was submitted and Revision 1 was approved on June 27, 1995 for use during conduct of the Passaic River Study Area Remedial Investigation activities. Subsequent modifications to the SOP were made based on comments made by Mr. Sied Quadri of USEPA during the submittal/review process for the QAPP addendum to the Remedial Investigation Work Plan for the Passaic River Study Area. These modifications were included in Revision 2 of the SOP developed by EDS.



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When the ESP Work Plan and QAPP were developed and submitted to USEPA on March 29, 1999, USEPA Region 2 still did not have a validation SOP for method 1613A. "Dioxin via 1613A Data Validation SOP Revision 2" dated June 13, 1996 was submitted as a part of the QAPP for the ESP at that time. The ESP and QAPP were subsequently approved for use by the USEPA on April 6, 1999. All work conducted on this project conforms to the requirements of this EPA-approved QAPP.

The second attachment to this letter is a copy of the first page of "Dioxin via 1613A Data Validation SOP Revision 2" dated June 13, 1996, which is contained in Appendix T, Data Validation Standard Operating Protocols of the ESP QAPP Appendices, Volume 3 of 6, submitted on March 29, 1999, and approved by USEPA on April 6, 1999. This page provides further detail of the history of this SOP.

The USEPA should conduct re-validation in accordance with the EPA-approved QAPP, not switch to a different SOP that has not been approved, nor used for this project. Otherwise, the re-validation will be meaningless; analytical data evaluated by one method cannot be properly re-validated by a different method that was never approved for use on this project and never incorporated into the approved QAPP.

If we need to have further discussions to resolve this discrepancy, please let me know so I can arrange to have Ms. Waldschmidt join us for a conference call.

Sincerely,



Clifford E. Firstenberg
Project Manager
On behalf of Occidental Chemical Corporation
(as successor to Diamond Shamrock Chemicals Corporation)

Attachments

1. E-mail from Karras to Jaffess, dated October 5, 2000
2. Dioxin via 1613A Data Validation SOP Revision 2, Appendix T, ESP QAPP Appendices

Copy to: D. Waldschmidt, Environmental Data Services, Ltd.

Cliff Firstenberg

From: Jaffess.Sharon@epamail.epa.gov
Sent: Thursday, October 05, 2000 2:25 PM
To: cfirstenberg@msn.com
Subject: Re: Dioxin SOP

Cliff,
If you have a direct contact at ALTA, you can forward this message to that person. Thanks.

----- Forwarded by Sharon Jaffess/R2/USEPA/US on 10/05/00 02:23 PM -----

	George Karras
	10/05/00
	01:37 PM

To:	Sharon Jaffess/R2/USEPA/US@EPA
cc:	Shari Stevens/R2/USEPA/US@EPA
Subject:	Re: Dioxin SOP

Hi:

When I was going through the Diamond Alkali data, I noticed ALTA lab modified the SOP for the SW-846 dioxin method (believe it was 8290) to fit the requirement of method 1613A. The lab should visit the following web site to pick up a copy of Method 1613A, SOP HW-25, Rev 2, Sept 1999 (PDF format).

<http://www.epa.gov/region02/smb/sops.htm>

SOP: DIOX
1613-01
Prepared: 06/96
REV: 2

DIOXIN VIA 1613A DATA VALIDATION SOP REVISION 2

History

The Passaic River Study Area approved Remedial Investigation Work Plan and Quality Assurance Project Plan dated January 1995, specified the use of the USEPA region II " Polychlorinated Dibenzodioxins/Polychlorinated Dibenzofurans Data Review SOP No. 11, Revision 2, June 1993 ", for PCDD/PCDF data validation.

On April 4, 1995 Scott Burton of Maxus Energy, was given a revised data validation SOP (No. HW-19 " USEPA Region II Data Validation SOP for SW-846 Method 8290 Polychlorinated Dibenzodioxins and Polychlorinated Dibenzofurans by High Resolution Gas Chromatography/High -Resolution Mass Spectrometry ") by USEPA region II for use on the Passaic River Study Area RI/FS project.

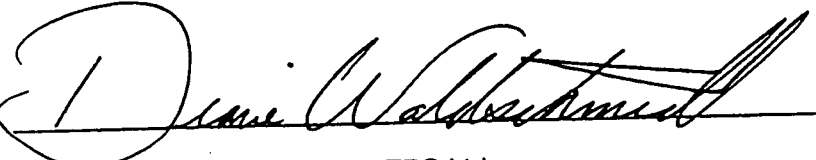
The samples collected for the RI/FS were to be analyzed via method 1613A. Upon review of the validation procedures listed above, it was decided that significant differences in QC and deliverables criteria exist between CLP, SW-846 8290, and method 1613A analytical protocols and that the project would be better served by using a modified validation procedure. The EDS " Dioxin Via 1613A Data Validation SOP , REV 1 was drafted and submitted for USEPA region II approval on June 16, 1995.

The EDS " Dioxin Via 1613A Data Validation SOP , REV 1 was approved for use on the Passaic River Study Area RI/FS per Mr. Lance Richman's letter to Scott Burton received on June 27, 1995.

Purpose and Scope

The " Dioxin Via 1613A Data Validation SOP Revision 2" data validation SOP was developed by EDS Ltd. to link method 1613A specific QC criteria and laboratory reporting protocols to data validation criteria.

When this document was created, USEPA Region II data validation SOP's did not include validation protocols for method 1613A. The EDS " Dioxin Via 1613A Data Validation SOP " has been reviewed by USEPA Region II personnel and has been approved for use on both the Passaic River Study Area Ecological Sampling Plan and Remedial Investigation Work Plan projects.

BY  DATE 6/13/96
Diane Waldschmidt, Director EDS Ltd.